

Exhibit I

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TELEBRANDS CORPORATION,)	Case No. 1:23-cv-00631-BMB
)	
Plaintiff,)	Judge Bridget Meehan Brennan
)	
v.)	
)	
WINSTON PRODUCTS LLC,)	
)	
Defendant.)	

**SUPPLEMENT TO REBUTTAL EXPERT
DECLARATION OF JOHN M. FELAND, III, PH.D**

1. My name is John M. Feland, III, and I have been retained as an expert by Tucker Ellis LLP on behalf of Defendant Winston Products LLC (“Winston”) in the above-captioned lawsuit.

2. I provide this declaration as a supplement to my January 16, 2024, declaration in this case.

3. In light of the arguments made by Dr. Glancey in his Sur-rebuttal Declaration, I developed a slight modification to the proposed constructions offered by Winston, adding the word “readily” to the construction of the term “secured” as it appears in the Group A, Group C, and Group D terms. I understand that on March 29, 2024, counsel for Winston sent counsel for Plaintiff Telebrands Corporation (“Telebrands”) a document reflecting this modification, entitled “Winston’s Updated Claim Constructions (03/29/2024),” a copy of which is attached hereto as **Exhibit A**.

4. I adopt the modifications reflected in Winston’s Updated Claim Constructions (03/29/2024), which does not alter any of the opinions reflected in my January 16, 2024,

declaration in this case.

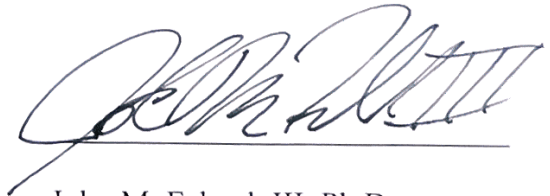
RESERVATION OF RIGHTS

5. I understand that discovery in this case is ongoing. I reserve the right to amend or supplement my opinions expressed above upon the discovery of new facts and information. This includes, but is not limited to, deposition testimony or additional documents and statements that I may become aware of.

6. I reserve the right to submit additional materials related to my opinion about the material phrase and its construction upon any critique or analysis of my opinions, including but not limited to a response to any testimony set forth by Plaintiff's expert Dr. James L. Glancey, or any testimony of other experts relied upon by the Plaintiff. In addition, I reserve the right to submit additional expert reports in this matter should they be needed or requested by the parties and/or Court. Finally, I reserve the right to rely on any visual aid or demonstrative in support of my opinions should the Court request my testimony.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 3 Apr 2024

A handwritten signature in black ink, appearing to read "John M. Feland, III", written over a horizontal line.

John M. Feland, III, Ph.D.

Exhibit A

Winston's Updated Claim Constructions (03/29/2024)

I. Group A

Claim Term/Phrase	Defendant's Construction
"secured"	"affixed or attached firmly so it cannot be readily removed from"
"to couple"	"to removably connect"
"coupled to"	"removably connected to"

II. Group B

Claim Term/Phrase	Defendant's Construction
"said inner and outer tubes unsecured between said first and second ends so that said outer tube is not held in frictional contact with said inner tube so that said outer tube can move freely along said inner tube"	"the inner and outer tubes are not affixed or attached firmly except at their first and second ends so that the outer tube can move freely along the inner tube between the couplers"
"said inner tube is unsecured to said outer tube between said first and second ends so that said outer tube can move freely over said inner tube"	"the inner tube is not affixed or attached firmly to the outer tube except at their first and second ends so that the outer tube can move freely along the inner tube between the couplers"
"said flexible inner tube unsecured to said flexible outer tube between said first and second ends so that said flexible outer tube can move freely over said flexible inner tube"	"the flexible inner tube is not affixed or attached firmly to the flexible outer tube except at their first and second ends so that the flexible outer tube can move freely over the flexible inner tube"

III. Group C

Claim Term/Phrase	Defendant's Construction
“a first restrictor sleeve secured to said first end of said inner and said outer tubes” / “a first restrictor sleeve secured to said first end of said flexible inner tube and said flexible outer tube”	“device that restricts the expansion of the inner tube and is affixed or attached firmly so it cannot be readily removed from the first end of the inner tube and the first end of the outer tube” / “a device that restricts the expansion of the inner tube and is affixed or attached firmly so it cannot be readily removed from the first end of the flexible inner tube and the first end of the flexible outer tube”
“a second restrictor sleeve secured to said second end of said inner and said outer tubes” / “a second restrictor sleeve secured to said second end of said flexible inner tube and said flexible outer tube”	“a device that restricts the expansion of the inner tube and is affixed or attached firmly so it cannot be readily removed from the second end of the inner tube and the second end of the outer tube” / “a device that restricts the expansion of the inner tube and is affixed or attached firmly so it cannot be readily removed from the second end of the flexible inner tube and the second end of the flexible outer tube”

IV. Group D

Claim Term/Phrase	Defendant's Construction
“a first securing device securing said first restrictor sleeve, said outer tube, and said inner tube to said first coupler” / “a first securing device securing said first restrictor sleeve, said flexible outer tube, and said flexible inner tube to said first coupler”	“a device encompassing and affixing or attaching firmly the first restrictor sleeve, the first end of the outer tube, and the first end of the inner tube to the first coupler so they cannot be readily removed” / “a device encompassing and affixing or attaching firmly the first restrictor sleeve, the first end of the outer tube, and the first end of the inner tube to the first coupler so they cannot be readily removed”

<p>“a second securing device securing said another expansion restrictor sleeve, said outer tube, and said inner tube to said second coupler” / “a second securing device securing said second expansion restrictor sleeve, said flexible outer tube, and said flexible inner tube to said second coupler”</p>	<p>““a device encompassing and affixing or attaching firmly the second restrictor sleeve, the second end of the outer tube, and the second end of the inner tube to the second coupler so they cannot be readily removed” / “a device encompassing and affixing or attaching firmly the second restrictor sleeve, the second end of the outer tube, and the second end of the inner tube to the second coupler so they cannot be readily removed”</p>
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